



Oregon

Theodore Kulongoski, Governor

Department of Environmental Quality

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To Whom It May Concern
Section of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, DC 20423

RE: Docket No. AB-515 (Sub-No. 2X)

Dear Sir or Madam:

The Oregon Department of Environmental Quality (DEQ) recently received a copy of the Combined Environmental and Historical Report for the Central Oregon and Pacific Railroad (CORP) proposal to abandon or discontinue service over approximately 119.5 miles of its Coos Bay Subdivision. DEQ Director Dick Pedersen asked that I comment on the document on behalf of DEQ.

DEQ is concerned about the air quality impacts of the transition from rail to truck transport for goods currently moved via rail from the Coos Bay area. While no regulatory authority is triggered, DEQ has a general preference for minimizing green house gas, particulate and hazardous air pollutant emissions where possible. We have not analyzed the information presented due to the time available for review, but it appears that consumption of over 500,000 additional gallons of diesel annually will generate additional air pollutants in the area affected.

We also have concerns for ensuring proper waste management for material actually removed from the railroad right of way during abandonment, particularly proper disposal of solid waste including railroad ties.

Finally, it is very important to ensure that Clean Water Act requirements related to construction activities and in-water work for stream crossings be carefully addressed. A NPDES stormwater permit may be required for the deconstruction of the rail line, and if stream crossings are to be removed there may be additional removal/fill regulations to be considered in collaboration with Oregon Department of State Lands and the US Army Corps of Engineers. We also have a general concern that stream crossings, culverts, etc. be maintained adequately in order to reduce the potential of water quality pollution associated with erosion.

If you have any questions, please contact me at 541-687-7355.

Sincerely,

Keith N. Andersen
Acting Western Region Administrator

cc Dick Pedersen, Director, Oregon Department of Environmental Quality
Chris Warner, Governor's Sr. Transportation Liaison, Oregon Department of Transportation
Kelly Taylor, Administrator, Rail Division, Oregon Department of Transportation
Terence M. Hynes, Sidley Austin LLP

